American Association of School Administrators

AESA
ASSOCIATION of EDUCATIONAL SERVICE AGENCIES

Before the Federal Communications Commission
Washington DC 20554
Ex Parte Filing in the Matter of: Broadband Needs in Education NPB Public Notice #15
GN Docket Nos. 09-47, 09-51, 09-137; CC Docket No. 02-6; WC Docket No. 05-195

February 25, 2010

Dear Sir/Madame:

On behalf of the *American Association of School Administrators*, representing more than 13,000 public school superintendents and local educational leaders and the *Association of Educational Service Agencies*, representing 553 collaborative education service agencies in 45 states, we would like to applaud the FCC for the leadership role they have taken to oversee the deployment of higher level connectivity across the country. AASA and AESA would like to offer information about the opportunities that dark fiber represents for schools, communities and broadband deployment.

AASA and AESA have long advocated that cost-effective access to dark fiber should be an allowable use under the E-Rate program. Dark fiber is already-installed fiber optics not currently being used. It may be possible to use dark fiber if the fiber owner agrees and the school district installs the necessary electronics and technology to "light" the dark fiber. AASA and AESA surveyed their members in an effort to provide the FCC with information illustrating any dollar savings that states/districts would experience through the use of dark fiber, examples of how states/districts could use dark fiber to multiply bandwidth, or general information to demonstrate the economic benefit of making dark fiber an allowable use. 154 members completed this survey n February 2010.

A strong majority (90 percent) of respondents receive E-Rate funding and more than one-quarter (29 percent) of respondents report having access to dark fiber. Roughly the same amount (30 percent) are unsure whether or not they have access to dark fiber, and 40 percent do not have access to dark fiber. Almost two-thirds (64 percent) of respondents are not making use of dark fiber. Only 15 percent of respondents are currently making use of dark fiber. Beyond this snapshot information the survey asked respondents to detail information about the cost comparison/benefits associated with accessing and using dark fiber.

The open-ended responses had very common themes, illustrating not only significant cost-saving opportunities, but also faster, more efficient connectivity. Members report being able to upgrade their connectivity backbone without increasing month-to-month costs. Respondents perceive the option to use dark fiber as win-win, especially in rural areas: Lighting dark fiber (much of which already exists for telecommunications companies to run their remote equipment and service centers) and making it available to schools through E-Rate would provide schools broadband without having to build private WANs, help utility companies recover portions of their investment and save money that can be reinvested in schools. We have included some of the most illustrative responses on the next page. *See Next Page.*

We hope you find this information helpful as the FCC moves forward with its consideration of E-Rate and the national broadband plan. AASA and AESA support the government's efforts to increase access to broadband across the country, and encourage consideration for dark fiber to be on the eligible services list for E-Rate, better enabling districts and service agencies to leverage existing resources. Please contact me with any questions.

Sincerely,

Mary Kusler
Assistant Director, Policy and Advocacy
AASA

Selected Responses
AASA/AESA Survey
February 2010

Q: If your ESA (or districts in your ESA) was able to access dark fiber, please detail any information you have about the cost comparison/benefits associated with accessing and using that dark fiber.

'It gave us almost unlimited capacity and speed with a reduction of one third of our former cost through the telecom providers.'

'…The greatest advantage this [dark fiber] offered was giving them the ability to upgrade from a gig backbone to a 10 gig backbone without increase month to month costs. The majority of our links are monitored by the providing entity and to have done the upgrade to 10 gig would normally have significantly increased the month to month expense. We would receive a huge advantage to have unmonitored dark fiber links that could light up with the equipment of our choice.'

'Our schools would certainly benefit from being able to access dark fiber, as we are located in [a rural community with] limited fiber/wireless connectivity due to the low population density and terrain. Many utility companies have installed fiber cabling to administer remote equipment, service centers, etc. Since they are not a telecommunications company they do not traditionally offer this excess capacity to the public. If this dark fiber was made available to schools and was supported by E-Rate funding, it would be a win-win, and certainly more cost-effective than having a district try to build their own private WAN using local funding. This would be a win-win, the utility companies could recover some of their investment, schools receive broadband, and save money that can be used for educating kids.'

'The major benefit is the Dark Fiber allows buildings to be connected at the backbone speed of their network, typically 1 Gbps. The districts that take advantage of this have all been able to reduce the File Server infrastructure district wide by housing all the servers at a central location. Having one "Server Farm" allows for a few servers to service the entire district and allows for faster maintenance as the support staff have access to all the servers from one location. Leased fiber connections typically are sold based on speed. Even 100 Mbps speeds often are cost prohibitive when purchased this way.'

'We believe the costs would be much lower because the telco providers would not have to manage and maintain the equipment or provide guaranteed service levels that are dependent on their equipment. This would allow more network and service flexibility, for the end user, compared to what exists now. Additionally, security benefits would exist since the dark fiber would be autonomous when compared to traditional means of consolidating many customers' data onto provider-lit fiber pipes.'

'We would need over 100+ miles of fiber to connect all my schools...We will never have the money (2.5 million) to build this much fiber. There is a ton of dark fiber in the area but it has never been offered to the schools to use. If we had access to dark fiber with only having to build the last mile laterals to our schools we would find a way to fund it. It would cut the time to connect and the cost would be minimal compared to building our own.'

'If we were to have access to dark fiber, the cost and speed of our telecommunications system would likely be lower IF the cost of the equipment needed to "light up" the dark fiber were also eligible under E-Rate regulations regardless of the agencies' discount level.'

'The use of dark fiber for our ESA provides for substantially greater bandwidth compared to telco services. We have been able to obtain cost savings of 50% over traditional carrier services while receiving a 750% increase in network performance. Reliability and stability of the network cannot be compared with the traditional carrier services. Dark fiber services also provide for planning of network growth based upon bandwidth need rather than cost.'